

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Marjory J. Salazar Debtor  Jose Luis Lioni Co-Debtor  Fay Servicing, LLC as servicer for Times Square Revolving Trust c/o Wilmington Savings Fund, FSB, as owner trustee Movant v.  Marjory J. Salazar Jose Luis Lioni Scott F. Waterman- Trustee Respondents	CASE NO.: 20-13966-pmm  CHAPTER 13  Judge: Patricia M. Mayer  Hearing Date: November 16, 2021 at 10:00 am  Objection Deadline: November 4, 2021
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**NOTICE OF MOTION FOR RELIEF FROM  
AUTOMATIC STAY AND CO-DEBTOR STAY**

Fay Servicing, LLC as servicer for Times Square Revolving Trust c/o Wilmington Savings Fund, FSB, as owner trustee has filed a Motion for Relief from Stay and Co-Debtor Stay with the Court in order to gain Court authority to foreclose on real property known as 547 N Front St, Reading, PA 19601.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 4, 2021 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lorraine Gazzara Doyle  
Friedman Vartolo, LLP  
1325 Franklin Avenue, Suite 230  
Garden City, NY 11530  
T: (212) 471-5100  
F: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on the 16th day of November 2021, at 10:00 A.M., at United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Dated: October 21, 2021

By: /s/Lorraine Gazzara Doyle  
Lorraine Gazzara Doyle, Esq.  
FRIEDMAN VARTOLO LLP  
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1325 Franklin Avenue, Suite 230  
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T: (212) 471-5100  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

TO:

**Trustee**

Scott F. Waterman (Chapter 13)  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

**Debtor's Counsel**

Brenna Hope Mendelsohn, Esquire  
Mendelsohn & Mendelsohn, PC  
637 Walnut Street  
Reading, PA 19601

**U.S. Trustee**

United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106

**Debtor**

Marjory J. Salazar  
547 North Front Street  
Reading, PA 19601

**Co-Debtor**

Jose Luis Lioni  
547 North Front Street  
Reading, PA 19601